

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

(Write the District and Division, if any, of the
court in which the complaint is filed.)

GREGORY D. ROBINSON

**Complaint for Violation of Civil
Rights**

(Prisoner Complaint)

Case No. _____
(to be filled in by the Clerk's Office)

(Write the full name of each plaintiff who is filing
this complaint. If the names of all the plaintiffs
cannot fit in the space above, please write "see
attached" in the space and attach an additional
page with the full list of names.)

-against-
City of Springfield, MO

(SEE ATTACHMENTS) E.A.b:c

(Write the full name of each defendant who is
being sued. If the names of all the defendants
cannot fit in the space above, please write "see
attached" in the space and attach an additional
page with the full list of names. Do not include
addresses here.)

REQUEST FOR TRIAL BY JURY

Plaintiff requests trial by jury. ☒ Yes ☐ No

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Gregory D. Robinson

All other names by which you have been known:

ID Number

157652

Current Institution

GREENE County Justice Center

Address

1000 N. BURNVILLE AVE.

SPRINGFIELD, MO. 65802

B. The Defendant(s)

- Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation.
- Make sure that the defendant(s) listed below are identical to those contained in the above caption.
- For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both.
- Attach additional pages if needed.

Defendant No. 1

Name

City of Springfield, MO.

Job or Title
(if known)

Shield Number

Employer

Address



Individual capacity



Official capacity

Defendant No. 2

Name

KEN MCCLURE

Job or Title
(if known)

MAYOR of Springfield, MO.

Shield Number

Employer

Address

CITY of Springfield, MO.

840 N. BOONVILLE AVE

Springfield, MO. 65802 (SEE ATT)



Individual capacity



Official capacity

II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):



Federal officials (a *Bivens* claim)



State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights.

What federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

FOURTH Amendment, FOURTEENTH Amendment

§.a-1

☒ Individual Capacity
 ☒ Official Capacity

NAME	John Williams
Job or title	Chief of Police
Shield Number	—
Employer	Springfield Police Department
Address	321 East Chestnut Expwy Springfield, MO 65802
NAME	RICHARD B. LESLIE
Job or title	TASK FORCE OFFICER / DEA
Shield Number	—
Employer	CHRISTIAN COUNTY POLICE DEPARTMENT
Address	110 W. Elm. St. Rt 70 OZARK, MO. 65731
NAME	J. HARPER
Job or title	Springfield, MO School Resource Officer
Shield Number	—
Employer	Springfield, MO Police department
Address	1331 N. Bownville Springfield, MO. 65802
NAME	B. HELMERS
Job or title	Springfield, MO. Police Officer
Shield Number	—
Employer	Springfield, MO. Police Department
Address	321 E. Chestnut Expwy Springfield, MO 65802

§.b-2 ☒ Individual Capacity ☐ Official Capacity

NAME	Cpl. JOSH STEELE
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JOB OR TITLE	INTERNAL AFFAIRS
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SHIELD NUMBER	—
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EMPLOYER	Springfield, MO. POLICE DEPARTMENT
----------	------------------------------------

ADDRESS	321 E. CHESTNUT EXPWY Springfield, MO 65802
---------	---

NAME	Cpl. DAVID KENYON
------	-------------------

JOB OR TITLE	Springfield, MO POLICE OFFICER
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SHIELD NUMBER	—
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EMPLOYER	Springfield, MO POLICE DEPARTMENT
----------	-----------------------------------

ADDRESS	321 E. CHESTNUT EXPWY Springfield, MO 65802
---------	---

NAME	T. DZHABBAROV
------	---------------

JOB OR TITLE	Springfield MO. POLICE OFFICER
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SHIELD NUMBER	—
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EMPLOYER	Springfield, MO. POLICE DEPARTMENT
----------	------------------------------------

ADDRESS	321 E. CHESTNUT EXPWY Springfield, MO. 65802
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NAME	C. Goldenberg
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JOB OR TITLE	Springfield, MO. POLICE OFFICER
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SHIELD NUMBER	—
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EMPLOYER	Springfield, MO. POLICE DEPARTMENT
----------	------------------------------------

ADDRESS	321 E. CHESTNUT EXPWY Springfield, MO. 65802
---------	--

4. C-3 ☒ Individual Capacity ☒ Official Capacity

NAME	N. THIEMAN
JOB OR TITLE	Springfield, MO. Police Officer
SHIELD NUMBER	_____
EMPLOYER	Springfield, MO. Police Department
ADDRESS	351 E. Chestnut Expwy Springfield, MO 65802
NAME	JANE DOE
JOB OR TITLE	Springfield, MO. Police Officer
SHIELD NUMBER	_____
EMPLOYER	Springfield, MO. Police Department
ADDRESS	351 E. Chestnut Expwy Springfield, MO 65802
NAME	John Doe
JOB OR TITLE	Springfield, MO. Police Officer
SHIELD NUMBER	_____
EMPLOYER	Springfield, MO. Police Department
ADDRESS	351 E. Chestnut Expwy Springfield, MO 65802

III. Prisoner Status

Indicate whether you are a prisoner or other confined person as follows (*check all that apply*):

- ☒ Pretrial detainee
- ☐ Civilly committed detainee
- ☐ Immigration detainee
- ☐ Convicted and sentenced state prisoner
- ☐ Convicted and sentenced federal prisoner
- ☐ Other (*explain*) _____

IV. Statement of Claim

Write a short and plain statement of FACTS that support your claim. Do not make legal arguments. You must include the following information:

- What happened to you?
- What injuries did you suffer?
- Who was involved in what happened to you?
- How were the defendants involved in what happened to you?
- Where did the events you have described take place?
- When did the events you have described take place?

If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Plaintiff Asserts that the Defendants are clearly liable pursuant to Title 42 U.S.C. § 1983 under color of state law violations and pursuant to Title 28 U.S.C. § 1331, Against Persons acting under color of Federal law for violations of Plaintiffs clearly established fourth Amendment Right (see Attachment

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To be Free From excessive and Deadly Force when He did not Pose an immediate threat of serious physical Harm to others.

Plaintiff first asserts that the city of Springfield, the Mayor and the Chief of Police violated Plaintiffs clearly established Fourth Amendment rights, because of their Deficiencies in the Hiring, Training and Supervisory practices of the School Resource officer and the Springfield Police Officers under the Color of State law pursuant To Title 42 U.S.C. 1983. Moreover, Plaintiff also argues multiple violations of the City's policies regarding Defendants actions which clearly resulted in A Deprivation of plaintiffs constitutional right to be free of an unlawful search and excessive-use-of-force incident, that escalated to an illegal arrest and unjustified Tasing and Beating of Plaintiff. The practices and policies created by the City of Springfield, the Mayor and Chief of Police is their responsibility and liability To provide Teachers proctors and instructors To provide up to date Training in the use of weapons, Tasers and Methods and procedures To correctly subdue A person. See (Bell v. Kansas City Police Dept, 635 F.3d 346, 347) (8th Cir 2011) (Factual Dispute as to whether the person Tased by police was complying with the

p.95.IV.b-2

Officers Direction was material to Determining whether the level of force was excessive.)

The City of Springfield has policies and procedures that are administered by the Mayor and Chief of Police for officers To follow the use of - force guidelines provide the Following:

The policy of the Department is to use only that Force which is reasonably necessary to accomplish lawful objectives Department employees who are in the position of observing what they believe to be an excessive amount of Force being utilized are charged with the Responsibility of Taking Appropriate action to curtail such an abuse of Authority...

The Defendants in this case like the City of Springfield, the Mayor and Chief of Police with the School Resource Officer and Springfield Police Department are all responsible and liable in A Direct an Indirect manner which strictly prohibits the officers from the use of excessive and deadly force Against citizens of the United States. Thus, Plaintiff further asserts that during the life span of this civil suit and the discovery process he will be Amending his claims to Add Defendants John and Jane Does.

A. THE COURT HAS JURISDICTION PURSUANT TO TITLE 28 USC § 1331

Plaintiff also asserts that Defendant Richard B. Leslie who is currently A Detective with the Christian County, Missouri, Sheriff Office and assigned as A Task Force Officer with the United States Drug Enforcement Administration is clearly liable under the Color of Federal law for violations of Plaintiffs clearly established Fourth Amendment right to be free from excessive and deadly Force when Plaintiff did not pose an immediate threat of serious harm to others. The Supreme Court recognizes A cause of action for implied damages against Federal officers in their individual and official Capacities for violations of the fourth Amendment. (Bivens v. Six Unknown Agents of Federal Bureau of Narcotics, 403 U.S. 388, 91 S. Ct. 1999 29 L.ED 2L 619 (1971)).

B. TRAFFIC STOP

Plaintiff next argues that the Defendants A Springfield School Resource officer, J. Harper and Springfield Police Officers, T. Dzhabbarov, C. Goldenberg; B. Helmers; and N. Thieman are the main actors acting under the color of state law who violated

Plaintiffs clearly established Fourth Amendment rights to be free of making an illegal Traffic stop which clearly escalated to A excessive and deadly Force claim based upon an unreasonable suspicion or "hunch". United States v. Sokolow, 490 U.S. 1, 7, 109 S. Ct. 1581, 104 L. Ed 2d 21.1 (1989). All Fourth Amendment claims brought under 42 U.S.C. § 1983 Alleging that A law enforcement officer has used deadly Force in the course of an arrest, investigatory stop, or other seizure, are properly analyzed under the Fourth Amendment "objective reasonable" standard Graham v. Connor, 490 U.S. 386, 394, 109 S. Ct. 1865, 104 L. Ed 2d 443 (1989). Reasonableness is justified from the perspective of A reasonable officer on the scene, rather than with 20/20 vision of hindsight. However, here Plaintiffs claim centers on whether A reasonable officer on the scene would have believed that Plaintiff posed an immediate threat to officers. The video and Facts of this case clearly and convincingly demonstrate that the officers position should not have used excessive and deadly Force, because there simply was no probable cause to believe Plaintiff posed A significant and immediate threat of Death or serious physical injury to the officers. Since, Plaintiff has not had A chance to conduct Discovery in his civil

P.05.IV-e-5

Rights claim. The Facts that Plaintiff can Testify under the penalty of perjury is to Plaintiff being completely subdued; the stunning and Taser^{ing} of Plaintiff; pulled from the Automobile and being maliciously and sadistically beaten and Attempted Murder claim. However, the Alleged facts, outside of Plaintiff's excessive and force issues are based on the Alleged probable cause statements from Defendants Detective Richard B. Leslie attached with the United States Drug Enforcement Administration (DEA) and Corporal David Kenyon from the Springfield Police Department. ^{EXHIBIT A} After A simple review of the Actual video footage of the arrest will clearly demonstrate that the Defendants probable cause practices are the classic case of no responsibility as seen from the officers excessive force claims from around the nation. Moreover, there is several videos from the actual arrest of Plaintiff that paint A vivid picture of Defendants clearly executing excessive and deadly force when Plaintiff had his hands out the window of the vehicle completely subdued. During the Discovery process Plaintiff will enter each video of the arrest as exhibits, to clearly establish a excessive and deadly claim.

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(police use of pepper spray on subdued arrestee was excessive force.") Furthermore, One who gives the badge of Authority of A police officer may not ignore the duty imposed by his office by failing to Act to prevent the use of excessive force on March 30th, 2020, it was clearly established that an officer who fails to intervene to prevent the unconstitutional use of excessive force by another officer may be held liable for violations of the Fourth Amendment. All the other circuits who have Addressed this issue have also recognized failure to intervene as A basis for liability under A Fourth Amendment claim. Thus, under ~~the~~ Totality of the circumstances the officers lacked probable cause To even stop Plaintiff's vehicle because no Traffic violation occurred and that the Traffic stop was simply a pretext to search Plaintiff's vehicle based on nothing more than A "hunch". At no part during the course of the stop did Plaintiff consent to any warrantless search of the vehicle therefore, the evidence will be suppressed as the fruits of an illegal traffic stop, detention, excessive and deadly force claim and illegal

C. QUALIFIED IMMUNITY

The Defendants named in Plaintiff's complaint are not entitled to qualified immunity because they clearly violated Plaintiff's established statutory and constitutional right. *Harlow v. Fitzgerald*, 457 U.S. 800, 818, 102 S. Ct. 2727, 73 L. Ed 2d 396 (1988). The Triable issue that will be before A jury is that qualified immunity is precluded because the use of force was objectively unreasonable. It's A Foregone conclusion, that Defendants argument before and during Trial will be that their excessive and deadly Force Action was reasonable under the circumstances. However, the Footage of the video of the Arrest points a crystal clear picture of no split second decision of any of the Defendants fearing for their life. Quite the Contrary, with the video footage and Plaintiff Testifying at Trial that on March 30th 2020 that he pulled over At Lyon and Atlantic To talk to his Mother and Sister when officer J. Harper pulled behind Defendants vehicle and Turned on his red emergency lights. The officers for some unknown reason, ran up to plaintiff on the drivers side and directed him to show his hands. Plaintiff immediately complied and stuck both hands

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and arms out the driver side of the vehicle window. A matter of fact, Plaintiff had A bowl of cereal in his right hand which is clearly apparent from the video footage. As soon as officers requested Plaintiff to show his hands he quickly complied to the officers directions. Common sense dictates that if Plaintiff has arms and hands out the window he is completely subdued. The video will further show that there was no split second decision that needed to be made on the spot, nor is there any evidence going to demonstrate that an officer was threatened. However, this non-threatening posture was not good enough For Defendants. The drivers side door was snatched open and C. Goldenberg maliciously and sadistically Stunned and Tasereed Plaintiff while he was completely subdued. Then officer T. Dzhabbarov and officer Helmers savagely pulled Plaintiff out of the vehicle and slamed him to the ground and started beating Plaintiff. Official immunity is A common law Doctrine that protects government officials from suit For Discretionary action taken by them in the course of their official duties. William V. Spain 209 F.3d 713 (8th Cir 2002), asserting that

"the linch Pin of qualified immunity is the objective reasonableness of the officers actions; objective reasonableness is Also applied in Analyzing the merits of fourth Amendment excessive force claims"; Nelson v. County of Wright 162 F.3d (Observing that the Standard For determining qualified immunity is identical To the standard For deciding the use of Force was excessive and that both involve consideration of objective reasonableness). Thus, under the Totality of circumstances, would conclude that the Defendants actions were objectively unreasonable and clearly violated Plaintiffs right to be Free from excessive and Deadly Force. Plaintiff has clearly and concisely established A Triable case against Defendants named in this civil action.

D. SUMMARY JUDGMENT

Lastly, Plaintiff asserts that after he files this civil suit and the District Court sets the briefing schedule and orders the Plaintiff and All the Defendants that it is Time to conduct discovery. Plaintiff is quite Sure he will be requesting leave of court To amend his complaint To broaden his issues and add John and Jane Doe as

p. 55. W. j. - 10

Additional Defendants. Naturally, only after Discovery is completed Defendants willness for summary judgment alleging that Plaintiff has Failed to state A claim. However, the record, the video and the Totality of the circumstances surrounding the Facts of Plaintiffs case will clearly demonstrate that the Defendants directly or indirectly are liable under A clear cut violation of Plaintiffs constitutional right to be Free of excessive and deadly Force. The critical inquiry is that summary judgment is only Appropriate when the pleadings, depositions, answers to interrogatories and admissions on file, Together with Affidavits, if any show that there is no genuine issue of material Fact and that the moving Party is entitled to A judgment As A matter of law. However, ~~the~~ District Court in recieving the Complete record in the light most Favorable to the non-moving party, ~~show~~ there are clearly genuine issues of material fact and the moving party is not entitled to judgment as a matter of law. Celotex Corp. v. Catrett, 477 U.S. 317, 323, 106 S. Ct. 22548, 91 L.E.d 2L. 265 (1986). The non-movant must do more than simply show that there

pg. 5. IV K-11

material facts and must come forward with specific facts showing that there is genuine issue for trial. Quoting Matsushita Elec.

Indus Co. v. Zenith Radio Corp. 475 U.S. 574, 586-87 106 S. Ct. 1348, 89 L. Ed 2d 538 (1986).

Only disputes are facts that might affect the outcome of the suit under the governing law will properly preclude the entry of summary judgment.

Anderson v. Liberty Lobby Inc. 477 U.S. 242, 248, 106 S. Ct. 2505, 91 L. Ed 2d 206 (1986) Thus, the

stunning and taser and beating of Plaintiff when the totality of the evidence clearly demonstrates that when Plaintiff was completely subdued the Defendants directly or indirectly not only went aside their defined job description. They intentionally, maliciously and sadistically caused harm to Plaintiff to where summary judgment is not warranted nor can the Defendant claim qualified immunity.

E. PLAINTIFF'S INADEQUATE MEDICAL CARE

Since the stunning and Taser and savagely beating of Plaintiff by Defendants on March 30, 2020, the Plaintiff has not only suffered from severe physical but he is also suffering from mental distress and anguish that is going to require adequate medical

p.g.5.IV.L-12


care like head, neck, shoulders, hip and Back Specialists, including An eye specialist. Moreover, psychologist and psychiatrist For emotional Distress. Plaintiff has filed medical request after medical request For physical and mental damage. The Greene County Justice Center is simply not equiped to handle Such severe medical problems. A simple review of Plaintiffs medical records will clearly demonstrate in adequate medical care. To relieve the current pain from the savage beating by Defendants he is forced to take A bottle of IBU profen and Asprin a week. At some point, during the life span of this civil suit, Plaintiff will have to file A motion to be moved To A Federal facility To where he will recieve Adequate needed care and an adequate law library.

WHEREFORE, For All the reasons stated above, Plaintiff is requesting that the District Court award \$5,000,000 ~~for~~ damages.

P.G.S. IV.M-13

July 12, 2020.

Respectfully Submitted,


GREGORY ROBINSON

V. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

BLURRED VISION IN LEFT EYE, bloody nose and bone slightly protruding out right side of nose. SCRAPES and bruises on right and left side of face swelling under both eyes. MIGRAINE HEAD-ACHES pain in neck, lower back and both legs. THE loss of THREE TEETH AND Emotional distress finally psychological damages.

VI. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

\$15,000,000 in actual and punitive damages for physical and emotional damages. AS WELL AS psychological damages

VII. Exhaustion of Administrative Remedies Administrative Procedures

The Prison Litigation Reform Act ("PLRA"), 42 U.S.C. § 1997e(a), requires that "[n]o action shall be brought with respect to prison conditions under section 1983 of this title, or any other Federal law, by a prisoner confined in any jail, prison, or other correctional facility until such administrative remedies as are available are exhausted."

Administrative remedies are also known as grievance procedures. Your case may be dismissed if you have not exhausted your administrative remedies.

- A. Did your claim(s) arise while you were confined in a jail, prison, or other correctional facility?

☐ Yes
☒ No

If yes, name the jail, prison, or other correctional facility where you were confined at the time of the events giving rise to your claim(s).

- B. Does the jail, prison, or other correctional facility where your claim(s) arose have a grievance procedure?

☒ Yes
☐ No
☐ Do not know

- C. Does the grievance procedure at the jail, prison, or other correctional facility where your claim(s) arose cover some or all of your claims?

☐ Yes
☐ No
☒ Do not know

If yes, which claim(s)?

- D. Did you file a grievance in the jail, prison, or other correctional facility where your claim(s) arose concerning the facts relating to this complaint?

☐ Yes
☒ No

If no, did you file a grievance about the events described in this complaint at any other jail, prison, or other correctional facility?

☐ Yes
☒ No

E. If you did file a grievance:

1. Where did you file the grievance?

Not Applicable

2. What did you claim in your grievance? *(Attach a copy of your grievance, if available)*

non Applicable

3. What was the result, if any? *(Attach a copy of any written response to your grievance, if available)*

non Applicable

4. What steps, if any, did you take to appeal that decision? Is the grievance process completed? If not, explain why not. *(Describe all efforts to appeal to the highest level of the grievance process.)*

non Applicable

F. If you did not file a grievance:

1. If there are any reasons why you did not file a grievance, state them here:

I WAS ARRESTED AND DETAINED AT THE GREENE COUNTY JUSTICE CENTER WHICH RESTRICTED ME FROM ANY ACCESS TO THE SPRINGFIELD MO. POLICE DEPARTMENT'S GRIEVANCE PROCESS.

2. If you did not file a grievance but you did inform officials of your claim, state who you informed, when and how, and their response, if any:

NON APPLICABLE

G. Please set forth any additional information that is relevant to the exhaustion of your administrative remedies.

NON APPLICABLE

(Note: You may attach as exhibits to this complaint any documents related to the exhaustion of your administrative remedies.)

VIII. Previous Lawsuits

The "three strikes rule" bars a prisoner from bringing a civil action or an appeal in federal court without paying the filing fee if that prisoner has "on three or more prior occasions, while incarcerated or detained in any facility, brought an action or appeal in a court of the United States that was dismissed on the grounds that it is frivolous, malicious, or fails to state a claim upon which relief may be granted, unless the prisoner is under imminent danger of serious physical injury." 28 U.S.C. § 1915(g).

To the best of your knowledge, have you had a case dismissed based on this "three strikes rule"?

☐ Yes
☒ No

If so, state which court dismissed your case, when this occurred, and attach a copy of the order if possible.

non Applicable

- A. Have you filed other lawsuits in state or federal court dealing with the same facts involved in this action?

☐ Yes
☒ No

- B. If your answer to A is yes, describe each lawsuit by answering questions 1 through 7 below. *(If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)*

1. Parties to the previous lawsuit

Plaintiff(s) non Applicable
Defendant(s) _____

2. Court *(if federal court, name the district; if state court, name the county and State)*

non Applicable

3. Docket or index number

non Applicable

4. Name of Judge assigned to your case

non Applicable

5. Approximate date of filing lawsuit

non Applicable

6. Is the case still pending?

☐ Yes
☒ No

If no, give the approximate date of disposition. non Applicable

7. What was the result of the case? (For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)

non Applicable

- C. Have you filed other lawsuits in state or federal court otherwise relating to the conditions of your imprisonment?

☐ Yes
☒ No

- D. If your answer to C is yes, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)

1. Parties to the previous lawsuit

Plaintiff(s)

non Applicable

Defendant(s)

2. Court (if federal court, name the district; if state court, name the county and State)

non Applicable

3. Docket or index number

non Applicable

4. Name of Judge assigned to your case

non Applicable

5. Approximate date of filing lawsuit

non Applicable

6. Is the case still pending?

☐
☒

Yes

No (If no, give the approximate date of disposition):

non Applicable

7. What was the result of the case? (For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)

Non Applicable

IX. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: July 12, 2020

Signature of Plaintiff

Printed Name of Plaintiff

Prison Identification #

Prison Address

City State Zip Code

Gregory D. Robinson
GREGORY D. ROBINSON
157652
1000 N. BOONVILLE AVE.
Springfield, MO. 65802

GREEN COCKLY D. KOBAL 151101000
GREENE County Justice Center
1000 N. Brownville
Springfield, MO. 65803

REC'D JUL 14 2020



Res Pro Se

21 S. Court House, Clerk's
222 N. 3rd &. Hammons Park
Springfield, Mo. 65806

LEGAL MAIL

JUL 13 2020
8:13A